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*Proposed Co-Counsel for Debtors and  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-13359 (VFP)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING TIME**

TO THE HONORABLE VINCENT F. PAPALIA, UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) by and through their undersigned counsel request that the time period to notice a hearing on the

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

*Debtors' Motion for Entry of an Order (I) Authorizing (A) the Rejection and Termination of Lease Pursuant to §§ 105, 363 and 365 and (B) the Parties to Enter into a Lease Termination Agreement Under Section 363(b) and (II) Granting Related Relief (the "Motion"),*<sup>2</sup> as required by Fed. R. Bankr. P. 2002 be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and respectfully submit:

1. A shortened time hearing is requested because: As more fully described in the Declaration of Holly Etlin, Chief Restructuring Officer and Chief Financial Officer of Bed Bath & Beyond Inc., in Support of the Debtors' Chapter 11 Petitions and First Day Motions [Docket No. 10], the Debtors commenced these Chapter 11 Cases to implement an expedited process to maximize the value of the Debtors' estates for the benefit of all stakeholders. The Debtors have commenced an orderly and value-maximizing wind down of their business, while contemporaneously marketing a sale of all or part of their business on an expedited timeline consented to by their prepetition and DIP lenders. Given the fast pace of these Chapter 11 Cases, the Debtors believe, in their business judgment, that entry into the Lease Termination Agreement (as defined in the Motion) is in the best interest of the estates. Moreover, given that the Termination Date shall be no later than May 31, 2023, it is imperative that the Motion is heard as soon as practicable. The Debtors do not believe that any party will be prejudiced by the shortened notice for a hearing, and the Lenders have not objected to the Lease Termination Agreement.

2. State the hearing dates requested: The Debtors respectfully request that the Court hear the Motion on May 31, 2023 at 10:00 a.m. (E.T.), the date that the Debtors and parties in

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<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

interest are scheduled to appear for the Court to consider the relief requested in the Bar Date Motion [Docket No. 295].

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

**WHEREFORE**, the Debtors respectfully request entry of the proposed order shortening time, in substantially the form submitted herewith, granting the relief requested herein and such other relief as is just and proper under the circumstances.

Dated: May 11, 2023

*/s/ Michael D. Sirota*

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